

**RETURN DATE: JUNE 22, 2021** : **SUPERIOR COURT**  
**JAMES J. PAPI** : **J.D. OF FAIRFIELD**  
**v.** : **AT BRIDGEPORT**  
**NBC UNIVERSAL MEDIA, LLC et al** : **MAY 21, 2021**

### **COMPLAINT**

1. At all times mentioned herein, the Defendant, NBC UNIVERSAL MEDIA, LLC was the production company for the syndicated television show “Judge Jerry,” starring talk show host Jerry Springer and filmed at the Stamford Media Center, 321 Atlantic Street in Stamford, Connecticut.

2. At all times mentioned herein, the Defendant, NBC UNIVERSAL MEDIA, LLC (hereinafter, “NBC”) was and is a limited liability corporation existing and organized under the existing laws of the State of Connecticut.

3. At all times mentioned herein, the Defendant, STAMFORD MEDIA CENTER & PRODUCTIONS, LLC, was and is a limited liability corporation existing and organized under the existing laws of the State of Connecticut.

4. At all times mentioned herein, the Defendant, STAMFORD MEDIA CENTER & PRODUCTIONS, LLC (hereinafter, “STAMFORD MEDIA”), owned/possessed, controlled and/or maintained the premises located at 321 Atlantic Street in Stamford, Connecticut (hereinafter, “the Premises”) and known as the Stamford Media Center, including the parking lot contained therein.

5. At all times relevant to this action, the Defendant, ALLIED UNIVERSAL SECURITY SVCS LLC, was and is a limited liability corporation existing and organized under the existing laws of the State of Connecticut.

6. At all times relevant to this action, the Defendant, ALLIED UNIVERSAL SECURITY SVCS LLC (hereinafter, “ALLIED UNIVERSAL SECURITY”), provided security for “Judge Jerry” at the Stamford Media Center.

7. At all times mentioned herein, the Defendant, SEAN POSEY LAKINS, was a resident of Bear, Delaware.

**COUNT ONE: NEGLIGENCE against NBC UNIVERSAL MEDIA, LLC**

1-7. Paragraphs 1-7 of the preamble are hereby incorporated as Paragraphs 1-4 of this Count One.

8. On October 14, 2020, the Plaintiff, JAMES J. PAPI, received an invitation to be a guest on a “Judge Jerry” episode involving the litigation of a contract dispute between him and the Defendant, SEAN POSEY LAKINS.

9. The Defendant, SEAN POSEY LAKINS, alleged that the Plaintiff, JAMES J. PAPI, and the Plaintiff’s contracting crew walked off site without finishing a project at the Defendant’s home.

10. On October 20, 2020, the Plaintiff, JAMES J. PAPI, filed a counterclaim against the Defendant, SEAN POSEY LAKINS, alleging that the Defendant threatened to assault members of the Plaintiff’s contracting crew.

12. On October 28, 2020, the Plaintiff, JAMES J. PAPI, and the Defendant, SEAN POSEY LAKINS, filmed the episode of “Judge Jerry” on the Premises, and Jerry Springer awarded the Defendant half of the damages he claimed.

13. At said time and place after the filming, agents, servants and/or employees of the Defendant, ALLIED UNIVERSAL SECURITY, escorted the Defendant, SEAN POSEY LAKINS, and the Plaintiff, JAMES J. PAPI, to the parking lot of the Premises at the same time.

14. Suddenly and without warning, the Defendant, SEAN POSEY LAKINS, ran toward the Plaintiff, JAMES J. PAPI, and punched the Plaintiff in the face while the Plaintiff was getting into his vehicle.

15. At all times mentioned herein, the Defendant, NBC, owed guests of “Judge Jerry,” including the Plaintiff, JAMES J. PAPI, the duty to use reasonable care to prevent assaults, like the one that occurred on July 20, 2020, from occurring both inside and outside of the Premises, including the exit of the Stamford Media Center, the entrance to the Stamford Media Center and the parking lot of Stamford Media Center.

16. As a result of the assault, the Plaintiff suffered the following painful injuries and underwent the following medical procedures:

- a. Right and anterior mandible fracture requiring surgical repair;
- b. Rightward displaced nasal bone fracture;
- c. Hematoma to the forehead;

- d. Broken teeth;
- e. Jaw pain;
- f. Neck pain;
- g. Lost wages;
- h. Severe shock to the nervous system;
- i. Pain and suffering.

17. Some or all of his injuries may be permanent in nature, have and will continue to cause him great pain and suffering, distress of the mind, limitation of movement and a loss of his ability to participate in the full extent of activities that life has to offer.

18. As a result of these injuries, the Plaintiff was forced to incur expenses for an ambulance, hospital care and treatment, surgical care and treatment, additional medical care, diagnostic testing and medications, and he may be forced to incur further expenses in the future.

19. As a further result of these injuries, the Plaintiff, JAMES J. PAPI, has endured substantial pain and suffering, discomfort, and will continue to do so in the future.

20. As a further result of these injuries, the plaintiff, JAMES J. PAPI's activities and leisure time pursuits have been greatly impaired, interrupted, and/or completely diminished.

21. The injuries, damages and losses sustained by the Plaintiff were caused by the negligence of the Defendant, NBC, in one or more of the following ways, in that they:

- a. failed to separate guests of "Judge Jerry," although they knew or should have known that guests of Jerry Springer's shows had a history of being physically combative with one another;
- b. failed to ensure defendants and plaintiffs on its show did not encounter one another directly after the filming of the show;
- c. failed to properly secure the parking lot and exterior of the Premises;
- d. failed to properly supervise the parking lot and exterior of the Premises;
- e. failed to properly and reasonably supervise persons entering and exiting the Premises;
- f. knew or should have known about the defective, dangerous and unsafe condition of the parking lot but failed to take steps to remediate the condition.

**COUNT TWO: NEGLIGENT SECURITY against NBC UNIVERSAL MEDIA, LLC**

1-20. Paragraphs one through twenty of the First Count are hereby incorporated and realleged as paragraphs one through twenty of the Second Count.

21. The Plaintiff's injuries were caused by the negligence and carelessness of the Defendant, NBC, for failing to take reasonable precautions to prevent an assault on the Premises

22. At all times relevant to this action, the Defendant, NBC, possessed a duty to use reasonable care in ensuring the security of patrons upon the Premises.

23. The defendant breached this duty in one, or more than one, of the following ways, in that they:

- a. failed to exercise reasonable care to prevent an assault from occurring on their premises
- b. failed to ensure the safety of those lawfully on the Premises;
- c. had been warned of the Defendant SEAN POSEY LAKIN's violent animus toward the Plaintiff and failed to take suitable measures for the protection of the Plaintiff;
- d. failed to intervene when the Plaintiff was being attacked;
- e. failed to provide a security staff adequate to supervise the premises and protect those lawfully on said Premises;
- f. tolerated disorderly conditions;
- g. failed to take adequate and sufficient measures to prevent, control and/or deter harmful, injurious, violent and/or dangerous acts from being committed on the Premises;
- h. knew or should have known that physical violence was occurring on the Premises and the surrounding area but failed to take any steps to adequately prevent it;
- i. failed to properly supervise the security personnel that they did provide;
- j. failed to properly train security personnel.

24. As a direct result of the Defendant, NBC's negligence and carelessness, and in particular by reason of the lack of such security, control and/or difference, an assailant was able to and did physically assault and batter the Plaintiff, thereby inducing serious and permanent injuries and damages on him.

**COUNT THREE: NEGLIGENCE against STAMFORD MEDIA CENTER & PRODUCTIONS, LLC**

1-14. Paragraphs 1-14 of Count One are hereby incorporated as Paragraphs 1-14 of this Count Three.

15. At all times mentioned herein, the Defendant, STAMFORD MEDIA, owed guests of “Judge Jerry,” including the Plaintiff, JAMES J. PAPI, the duty to use reasonable care to prevent assaults, like the one that occurred on July 20, 2020, from occurring both inside and outside of the Premises, including the exit of the Stamford Media Center, the entrance to the Stamford Media Center and the parking lot of Stamford Media Center.

16. As a result of the assault, the Plaintiff suffered the following painful injuries and underwent the following medical procedures:

- a. Right and anterior mandible fracture requiring surgical repair;
- b. Rightward displaced nasal bone fracture;
- c. Hematoma to the forehead;
- d. Broken teeth;
- e. Jaw pain;
- f. Neck pain;
- g. Lost wages
- h. Severe shock to the nervous system;
- i. Pain and suffering.

17. Some or all of his injuries may be permanent in nature, have and will continue to cause him great pain and suffering, distress of the mind, limitation of movement and a loss of his ability to participate in the full extent of activities that life has to offer.

18. As a result of these injuries, the Plaintiff was forced to incur expenses for an ambulance, hospital care and treatment, surgical care and treatment, additional medical care, diagnostic testing and medications, and he may be forced to incur further expenses in the future.

19. As a further result of these injuries, the Plaintiff, JAMES J. PAPI, has endured substantial pain and suffering, discomfort, and will continue to do so in the future.

20. As a further result of these injuries, the plaintiff, JAMES J. PAPI’s activities and leisure time pursuits have been greatly impaired, interrupted, and/or completely diminished.

21. The injuries, damages and losses sustained by the Plaintiff were caused by the negligence of the Defendant, STAMFORD MEDIA, in one or more of the following ways, in that they:

- a. failed to separate guests of “Judge Jerry,” although they knew or should have known that guests of Jerry Springer’s shows had a history of being physically combative with one another;

- b. failed to ensure defendants and plaintiffs on its show did not encounter one another directly after the filming of the show;
- c. failed to properly secure the parking lot and exterior of the Premises;
- d. failed to properly supervise the parking lot and exterior of the Premises;
- e. failed to properly and reasonably supervise persons entering and exiting the Premises;
- f. knew or should have known about the defective, dangerous and unsafe condition of the parking lot but failed to take steps to remediate the condition.

**COUNT FOUR: NEGLIGENT SECURITY against STAMFORD MEDIA CENTER & PRODUCTIONS, LLC**

1-20. Paragraphs one through twenty of the Count Three are hereby incorporated and realleged as paragraphs one through twenty of Count Four.

21. The Plaintiff's injuries were caused by the negligence and carelessness of the Defendant, STAMFORD MEDIA, for failing to take reasonable precautions to prevent an assault on the Premises

22. At all times relevant to this action, the Defendant, STAMFORD MEDIA, possessed a duty to use reasonable care in ensuring the security of patrons upon the Premises.

23. The defendant breached this duty in one, or more than one, of the following ways, in that they:

- a. failed to exercise reasonable care to prevent an assault from occurring on their premises
- b. failed to ensure the safety of those lawfully on the Premises;
- c. had been warned of the Defendant SEAN POSEY LAKIN's violent animus toward the Plaintiff and failed to take suitable measures for the protection of the Plaintiff;
- d. failed to intervene when the Plaintiff was being attacked;
- e. failed to provide a security staff adequate to supervise the premises and protect those lawfully on said Premises;
- f. tolerated disorderly conditions;
- g. failed to take adequate and sufficient measures to prevent, control and/or deter harmful, injurious, violent and/or dangerous acts from being committed on the Premises;

- h. knew or should have known that physical violence was occurring on the Premises and the surrounding area but failed to take any steps to adequately prevent it;
- i. failed to properly supervise the security personnel that they did provide;
- j. failed to properly train security personnel.

24. As a direct result of the Defendant, STAMFORD MEDIA's negligence and carelessness, and in particular by reason of the lack of such security, control and/or difference, an assailant was able to and did physically assault and batter the Plaintiff, thereby inducing serious and permanent injuries and damages on him.

**COUNT FIVE: NEGLIGENCE against ALLIED UNIVERSAL SECURITY SVCS LLC**

1-14. Paragraphs 1-14 of Count One are hereby incorporated as Paragraphs 1-14 of this Count Five.

15. At all times mentioned herein, the Defendant, ALLIED UNIVERSAL SECURITY, owed guests of "Judge Jerry," including the Plaintiff, JAMES J. PAPI, the duty to use reasonable care to prevent assaults, like the one that occurred on July 20, 2020, from occurring both inside and outside of the Premises, including the exit of the Stamford Media Center, the entrance to the Stamford Media Center and the parking lot of Stamford Media Center.

16. As a result of the assault, the Plaintiff suffered the following painful injuries and underwent the following medical procedures:

- a. Right and anterior mandible fracture requiring surgical repair;
- b. Rightward displaced nasal bone fracture;
- c. Hematoma to the forehead;
- d. Broken teeth;
- e. Jaw pain;
- f. Neck pain;
- g. Lost wages;
- h. Severe shock to the nervous system;
- i. Pain and suffering.

17. Some or all of his injuries may be permanent in nature, have and will continue to cause him great pain and suffering, distress of the mind, limitation of movement and a loss of his ability to participate in the full extent of activities that life has to offer.

18. As a result of these injuries, the Plaintiff was forced to incur expenses for an ambulance, hospital care and treatment, surgical care and treatment, additional medical care, diagnostic testing and medications, and he may be forced to incur further expenses in the future.

19. As a further result of these injuries, the Plaintiff, JAMES J. PAPI, has endured substantial pain and suffering, discomfort, and will continue to do so in the future.

20. As a further result of these injuries, the plaintiff, JAMES J. PAPI's activities and leisure time pursuits have been greatly impaired, interrupted, and/or completely diminished.

21. The injuries, damages and losses sustained by the Plaintiff were caused by the negligence of the Defendant, ALLIED UNIVERSAL SECURITY, in one or more of the following ways, in that they:

- a. failed to separate guests of "Judge Jerry," although they knew or should have known that guests of Jerry Springer's shows had a history of being physically combative with one another;
- b. failed to ensure defendants and plaintiffs on its show did not encounter one another directly after the filming of the show;
- c. failed to properly secure the parking lot and exterior of the Premises;
- d. failed to properly supervise the parking lot and exterior of the Premises;
- e. failed to properly and reasonably supervise persons entering and exiting the Premises;
- f. knew or should have known about the defective, dangerous and unsafe condition of the parking lot but failed to take steps to remediate the condition.

**COUNT SIX: NEGLIGENCE SECURITY against STAMFORD MEDIA CENTER & PRODUCTIONS, LLC**

1-20. Paragraphs one through twenty of the Count Five are hereby incorporated and realleged as paragraphs one through twenty of Count Six.

21. The Plaintiff's injuries were caused by the negligence and carelessness of the Defendant, ALLIED UNIVERSAL SECURITY, for failing to take reasonable precautions to prevent an assault on the Premises

22. At all times relevant to this action, the Defendant, ALLIED UNIVERSAL SECURITY, possessed a duty to use reasonable care in ensuring the security of patrons upon the Premises.

23. The defendant breached this duty in one, or more than one, of the following ways, in that they:

- a. failed to exercise reasonable care to prevent an assault from occurring on their premises
- b. failed to ensure the safety of those lawfully on the Premises;
- c. had been warned of the Defendant SEAN POSEY LAKIN's violent animus toward the Plaintiff and failed to take suitable measures for the protection of the Plaintiff;
- d. failed to intervene when the Plaintiff was being attacked;
- e. failed to provide a security staff adequate to supervise the premises and protect those lawfully on said Premises;
- f. tolerated disorderly conditions;
- g. failed to take adequate and sufficient measures to prevent, control and/or deter harmful, injurious, violent and/or dangerous acts from being committed on the Premises;
- h. knew or should have known that physical violence was occurring on the Premises and the surrounding area but failed to take any steps to adequately prevent it;
- i. failed to properly supervise the security personnel that they did provide;
- j. failed to properly train security personnel.

24. As a direct result of the Defendant, ALLIED UNIVERSAL SECURITY's negligence and carelessness, and in particular by reason of the lack of such security, control and/or difference, an assailant was able to and did physically assault and batter the Plaintiff, thereby inducing serious and permanent injuries and damages on him.

**COUNT SEVEN: NEGLIGENT ASSAULT against SEAN POSEY LAKINS**

1-14. Paragraphs 1-14 of Count One are hereby incorporated as Paragraphs 1-14 of this Count Seven.

15. Said occurrence was the direct and proximate result of the negligence and carelessness of the Defendant, SEAN POSEY LAKINS, in one or more of the following ways, in that he:

- a. failed and neglected to make a reasonable use of his facilities to ascertain the proximity of the Plaintiff before swinging his fist;
- b. performed his actions in an inattentive manner and without a proper lookout for persons such as the Plaintiff, who was in his vicinity;
- c. failed to give the Plaintiff any signal or warning of his activity;
- d. failed to keep his limbs under proper and reasonable control;

- e. failed to be watchful of his surroundings, of what he was doing and of the general conditions then and there existing;
- f. failed to conduct himself in the manner of a reasonably prudent person under the circumstances;
- g. conducted himself in a manner when he knew or should have known it would cause harm to others, including the Plaintiff.

16. As a result of the negligence of the Defendant, SEAN POSEY LAKINS, the Plaintiff suffered the following painful injuries and underwent the following medical procedures:

- a. Right and anterior mandible fracture requiring surgical repair;
- b. Rightward displaced nasal bone fracture;
- c. Hematoma to the forehead;
- d. Broken teeth;
- e. Jaw pain;
- f. Neck pain;
- g. Lost wages
- h. Severe shock to the nervous system;
- i. Pain and suffering.

17. Some or all of his injuries may be permanent in nature, have and will continue to cause him great pain and suffering, distress of the mind, limitation of movement and a loss of his ability to participate in the full extent of activities that life has to offer.

18. As a result of these injuries, the Plaintiff was forced to incur expenses for an ambulance, hospital care and treatment, surgical care and treatment, additional medical care, diagnostic testing and medications, and he may be forced to incur further expenses in the future.

19. As a further result of these injuries, the Plaintiff, JAMES J. PAPI, has endured substantial pain and suffering, discomfort, and will continue to do so in the future.

20. As a further result of these injuries, the plaintiff, JAMES J. PAPI's activities and leisure time pursuits have been greatly impaired, interrupted, and/or completely diminished.

**COUNT EIGHT: ASSAULT against SEAN POSEY LAKINS**

1-14. Paragraphs 1-14 of Count One are hereby incorporated as Paragraphs 1-14 of this Count Eight.

15. The Plaintiff's injuries and damages were caused by the intentional, willful and/or malicious conduct of the Defendant, SEAN POSEY LAKINS, in one or more of the following respects, in that he:

- a. intended to and did make or recklessly created a risk of physical harm to the plaintiff as described herein;
- b. violated Conn. Gen. Stat. 53a-181 by engaging in a breach of peace;
- c. violated Conn. Gen. Stat. 53a-61a by committing the third-degree assault of an elderly person.

16. As a result of the assault, the Plaintiff suffered the following painful injuries and underwent the following medical procedures:

- a. Right and anterior mandible fracture requiring surgical repair;
- b. Rightward displaced nasal bone fracture;
- c. Hematoma to the forehead;
- d. Broken teeth;
- e. Jaw pain;
- f. Neck pain;
- g. Lost wages;
- h. Severe shock to the nervous system;
- i. Pain and suffering.

17. Some or all of his injuries may be permanent in nature, have and will continue to cause him great pain and suffering, distress of the mind, limitation of movement and a loss of his ability to participate in the full extent of activities that life has to offer.


18. As a result of these injuries, the Plaintiff was forced to incur expenses for an ambulance, hospital care and treatment, surgical care and treatment, additional medical care, diagnostic testing and medications, and he may be forced to incur further expenses in the future.

19. As a further result of these injuries, the Plaintiff, JAMES J. PAPI, has endured substantial pain and suffering, discomfort, and will continue to do so in the future.

20. As a further result of these injuries, the plaintiff, JAMES J. PAPI's activities and leisure time pursuits have been greatly impaired, interrupted, and/or completely diminished.

**WHEREFORE**, the Plaintiff demands monetary damages and such other relief as the Court deems appropriate. The amount, legal interest or property in demand exceeds fifteen thousand dollars (\$15,000.00), exclusive of interest and costs.

**THE PLAINTIFF,**


By:   
\_\_\_\_\_  
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**STATEMENT OF AMOUNT IN DEMAND**

WHEREFORE, the Plaintiff claims monetary damages. The amount of damages sought is more than Fifteen Thousand (\$15,000.00) Dollars, exclusive of interest and costs. The relief sought is within the jurisdiction of the Superior Court of the State of Connecticut.

**THE PLAINTIFF,**

By:   
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